A useful FinCEN tip is not simply a large collection of documents. It is a clear, factual account that helps reviewers understand what may have happened, who or what may have been involved, when events occurred, and where supporting information can be found. Before submitting anything, organize your notes so that you can distinguish what you personally observed from what someone else told you, and separate documented facts from your conclusions.

This article explains FinCEN's role, basic Bank Secrecy Act (BSA) and suspicious activity report (SAR) concepts, examples of potentially reportable conduct, and a practical way to prepare your information. It is general information, not legal advice. For current program instructions and eligibility details, check the FinCEN whistleblower program page. For educational materials on anti-money laundering topics, see ACAMS training resources.

What Is FinCEN, and What Does It Do?

The Financial Crimes Enforcement Network (FinCEN) is a bureau of the U.S. Department of the Treasury. It administers key parts of the BSA, a federal framework intended to help detect and deter money laundering and other financial crime. Among other responsibilities, FinCEN issues regulations and guidance, collects certain financial reports, and makes financial intelligence available to appropriate law-enforcement and regulatory authorities.

FinCEN is not a general police department, and sending a tip does not itself start a prosecution, guarantee an investigation, or establish that anyone violated the law. The information may be reviewed and, where appropriate, used or shared in accordance with applicable rules. The whistleblower program page explains the current process and any requirements that may apply to a person seeking an award. An award is not guaranteed; eligibility and payment depend on the governing law and the facts of a particular matter.

Read the official instructions before submitting. If you are considering an award claim, or if your information involves confidential business records, legal obligations, or possible retaliation, consider speaking with a qualified attorney about your rights and how to submit safely.

BSA and SAR Reporting Basics

The BSA and its implementing regulations require certain financial institutions and other covered businesses to maintain records and file reports. These requirements can include customer identification, recordkeeping, currency transaction reporting, and suspicious activity reporting. Which requirements apply depends on the type of institution, transaction, and circumstances.

What a SAR is—and what it is not

A SAR is a report that a covered financial institution files with FinCEN when it knows, suspects, or has reason to suspect activity that meets applicable reporting standards. A SAR is not a court finding that a crime occurred. A transaction may be suspicious even if the institution does not know the full explanation; conversely, an unusual transaction is not automatically criminal.

Individuals outside a covered institution generally do not file an institution's SAR on its behalf. A person with information about possible violations can review FinCEN's whistleblower program instructions and other relevant official reporting channels. SARs and information that would reveal the existence of a SAR are subject to confidentiality restrictions. Do not ask an institution to disclose a SAR, claim that a SAR exists

without a reliable basis, or share restricted information you are not authorized to disclose. If you work for a financial institution, follow your organization's procedures and get appropriate legal or compliance guidance before handling internal records.

What Conduct Might Be Reportable?

FinCEN's program and applicable laws determine what information may be relevant. Examples below are illustrations, not a checklist that proves a violation. A transaction pattern can have an innocent explanation, and context matters.



- **Possible money laundering:** transactions that appear designed to conceal the origin, ownership, or movement of funds connected to unlawful activity.
- **Possible sanctions evasion:** activity that may conceal a sanctioned person's involvement or route funds through intermediaries. Sanctions questions can involve agencies and rules beyond FinCEN, so describe the facts rather than making a legal conclusion.
- **Possible fraud proceeds:** payments or transfers that appear connected to a fraud scheme, including movement of funds through multiple accounts or entities.
- **Possible structuring:** breaking transactions into smaller amounts in a way that may be intended to evade reporting or recordkeeping requirements. Amounts alone do not establish structuring or intent.
- **Possible misuse of entities or accounts:** companies, nominees, or accounts that appear to obscure who controls funds or benefits from transactions.
- **Potential BSA compliance failures:** facts suggesting that a covered business may have failed to meet an applicable reporting, recordkeeping, or other BSA obligation. Describe what you know and how you know it; do not assume a compliance failure from a single unusual event.

Use careful language such as "I observed," "the record shows," or "I was told." If you believe an event may indicate a violation, say so as a concern or inference and identify the facts supporting it. Avoid presenting a suspicion as a proven fact.

How to Prepare a High-Quality Tip

Organize your information before using any submission channel. The goal is to make the relevant facts understandable without burying them in unrelated material. A focused summary, a reliable timeline format, and a searchable evidence inventory are often more useful than a long narrative with no signposts.

1. Write a short, factual overview

Start with a brief summary: what activity concerns you, the approximate period, the main people or entities involved, and why you believe the information may be relevant to FinCEN. Keep conclusions separate from supporting facts. Identify what you personally saw, what you learned from records, and what someone else told you.

For example: “I reviewed invoices dated March through June that show payments to Company A. A colleague told me that Company B controls Company A; I have not independently verified that relationship.” This is more informative than stating, without support, that two companies are “fronts.”

Keep a paper trail: retain a dated copy of your overview and note when and from which records you prepared it. Do not alter original documents to make them fit your summary.

2. Build a timeline format

A timeline helps a reviewer follow events and compare them with records. Use one row per event where practical. Include exact dates and times when known; label estimates and explain the source of each date. If time zones matter, note the time zone. If there are gaps, leave them visible instead of filling them with guesses.

Date or period Event or transaction People/entities involved Source and confidence May 14, 2025, approximate Payment initiated from Account X to Vendor Y Company A; Vendor Y Invoice and bank record; date is shown on the record May 20, 2025 Manager described Vendor Y as controlled by another party Manager; Vendor Y Conversation recalled by the note-taker; not independently verified

Link each timeline entry to a document or note identifier in your evidence inventory. Avoid merging separate transactions into one entry just because they involve the same parties.



Keep a paper trail: save dated versions of the timeline and record any later corrections, including what changed and why. Preserve the original notes where lawful and appropriate.

3. Identify names, entities, and accounts precisely

Record full names and known aliases, entity names as they appear in records, business addresses, and any relevant relationship between parties. For accounts, include only identifying details you lawfully possess and that are relevant. A masked account number or last four digits may be enough for your working notes; do not treasury fincen reporting circulate full account numbers unnecessarily.

Distinguish confirmed information from assumptions. “The incorporation record lists Jordan Lee as an officer” is different from “Jordan Lee owns the company.” If ownership, control, or a relationship is uncertain, say so and identify the source of the belief.

Keep a paper trail: note where each name, alias, address, or account identifier came from and when you recorded it. Store working copies with access limited to people who have a legitimate need to review them.

4. Record amounts and transaction IDs

For each relevant transaction, record the amount, currency, date, direction of funds, and known sender and recipient. Include transaction IDs, wire references, check numbers, invoice numbers, or other identifiers when available. Preserve the exact identifier as it appears in the source; do not “correct” an apparent typo without noting the discrepancy.

When totals are useful, show how you calculated them and list the underlying transactions. Separate confirmed amounts from estimates, and explain conversions if multiple currencies are involved. Avoid implying that a transaction is suspicious solely because it is large, repeated, or close to a reporting threshold.

Keep a paper trail: maintain the calculation method and source references alongside any totals. That makes it easier to trace a summary back to the original records.

5. Create an evidence inventory

An evidence inventory is a simple index of material that supports, contradicts, or provides context for your account. It should help someone locate a record without requiring you to attach every file. Include the item’s date, type, source, relevant event, and any handling or access concerns.

Item ID Description Date/source Related timeline entry Handling note E-01 Invoice showing payment amount and vendor name June 2, 2025; company records T-04 Contains customer information; review before sharing E-02 Email discussing a proposed transfer June 3, 2025; received by the note-taker T-05 Preserve full message and metadata if authorized

Include records that may complicate your theory as well as those that appear to support it. Flag whether an item is an original, a copy, a screenshot, or a summary. Do not edit, annotate, or crop the only copy of a source record. Do not access systems or accounts without authorization, and do not take documents you are not permitted to possess.

Keep a paper trail: maintain the inventory and a record of where files are stored, who has access, and any transfers or copies made. Use secure storage appropriate to the sensitivity of the information. Before submitting documents, consider privacy, confidentiality, privilege, and your authority to disclose them; follow the official submission instructions rather than sending sensitive material to an unverified contact.

6. Separate first-hand knowledge from second-hand information

For every important statement, ask: Did I personally observe this? Did I see it in a record? Did someone tell me? Is it an inference? Label the answer in your notes. If a source is second-hand, identify the source and approximate date of the communication where appropriate. Do not present hearsay as something you witnessed.

Also note facts that do not fit your current understanding. A balanced account is more credible and helps reviewers assess the information without having to guess what you omitted.

Keep a paper trail: date your notes, identify the author, and preserve the distinction between contemporaneous notes and later recollections. If you correct a note, keep a transparent record of the correction.

Before You Submit

1. Check the current instructions on FinCEN's whistleblower program page, including any applicable forms, eligibility terms, and submission directions.
2. Review the overview, timeline, names/entities/accounts list, transaction details, and evidence inventory for consistency.
3. Remove unsupported conclusions, mark estimates clearly, and make sure each key claim points to its source.
4. Consider whether material contains sensitive personal, financial, business, or legally protected information. Share only what is appropriate and authorized through the official process.
5. Keep a copy of what you submit and a record of the date, method, and any confirmation you receive. Do not assume a submission will produce a particular result or timeline.

ACAMS materials can help build general AML knowledge, but they are educational resources—not a substitute for FinCEN's current instructions or individualized legal advice. The strongest preparation is careful, restrained documentation: a readable timeline format, precise names, entities and accounts, traceable amounts and transaction IDs, and a well-maintained evidence inventory. Above all, make clear what you saw, what you heard, what the records show, and what remains uncertain.